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July 8, 2024

**VIA CM/ECF ONLY**

Hon. José R. Almonte, U.S.M.J  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
Court Room PO 9  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Lorenzo v. Borough of Palisades Park, et al.  
Civil Action No. 23-21849 (CCC-JRA)**

**Ashley v. Borough of Palisades Park, et al.  
Civil Action No. 24-6285 (CCC-JRA)**

Dear Judge Almonte:

This Firm represents Defendants Jae Park and Stephanie Jang in the above-referenced matters. On June 17, 2024, the parties in the *Lorenzo* matter submitted a joint status update regarding consolidation. At that time, we were not able to take a position on consolidation, as we only represented Mr. Park and Ms. Jang in the *Lorenzo* matter. Last week, we were assigned the *Ashley* matter. We have conferred with plaintiffs' counsel and provide the following update.

On behalf of Mr. Park and Ms. Jang, we consent to consolidating these actions for discovery. In addition, with the consent of plaintiffs' counsel, we respectfully request until July 31, 2024, to file our responsive pleadings in both matters. The date requested is at least partially due to my upcoming vacation, which is expected to run from July 12, 2024 until July 22, 2024.

We thank the Court for its courtesies. If Your Honor has any questions or concerns, please contact me. Thank you.

Very truly yours,

***/s/Roshan D. Shah***

ROSHAN D. SHAH, ESQ.  
For the Firm

c: All Counsel of Record